

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ICICI BANK UK PLC, : Case No. 15-5379 (VEC)  
Plaintiff, :  
- against - :  
CARGILL, INCORPORATED AND CARGILL :  
FINANCIAL SERVICES INTERNATIONAL, :  
INC., :  
Defendants. :  
-----X  
CARGILL, INCORPORATED AND CARGILL :  
FINANCIAL SERVICES INTERNATIONAL, :  
INC., :  
Third-Party Plaintiffs, :  
- against - :  
THE RECEIVABLES EXCHANGE, LLC, :  
Third-Party Defendant. :  
-----X  
ICICI BANK UK PLC, :  
Plaintiff on the :  
Additional Claim, :  
- against - :  
THE RECEIVABLES EXCHANGE, LLC, :  
Defendant on the :  
Additional Claim :  
-----X

**PLEASE TAKE NOTICE** that upon the Declaration of Michael T. Sullivan, executed on October 5, 2015, and the exhibits thereto, and the accompanying Memorandum of Law in Support, and all prior pleadings and proceedings had herein, plaintiff ICICI Bank UK plc will move this Court, before the Honorable Valerie E. Caproni, 40 Foley Street, Courtroom 443, New York, New York, for (i) an Order, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, granting leave to amend its Complaint, and (ii) such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, any opposing affidavits and answering memoranda shall be served within 14 days after service of this motion.

Dated: New York, New York  
October 5, 2015

**SULLIVAN & WORCESTER LLP**

By: /s/Michael T. Sullivan  
Michael T. Sullivan

Clark A. Freeman

1633 Broadway  
New York, New York 10019  
Telephone: (212) 660-3000  
Facsimile: (212) 660-3001

*Attorneys for Plaintiff*